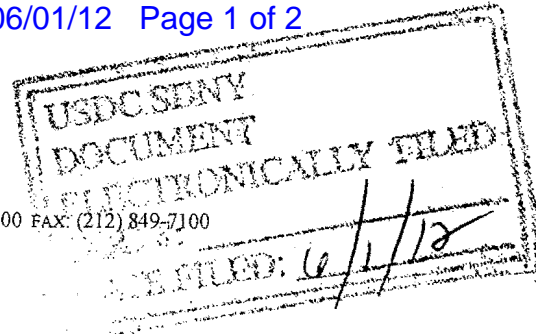


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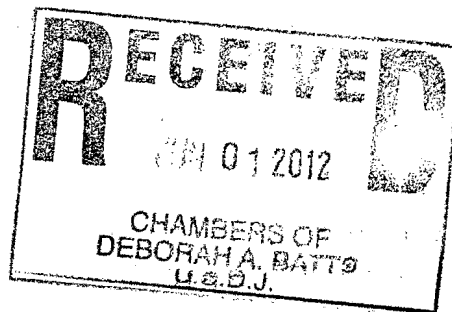
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June 1, 2012

VIA HAND DELIVERY

The Honorable Deborah A. Batts
United States District Court
United States Courthouse
500 Pearl Street, Room 2510
New York, NY 10007



Re: *Kingate Global Fund Ltd., et al. v. Deutsche Bank Securities Inc.*, No. 11-cv-9364 (DAB)

Dear Judge Batts:

We represent Plaintiffs-Counterclaim Defendants Kingate Global Fund Ltd. and Kingate Euro Fund Ltd. ("Kingate") in the above-referenced action. We write to request, on behalf of both Kingate and Defendant-Counterclaim Plaintiff Deutsche Bank Securities Inc., that the Court include an additional two-month stay of discovery in its forthcoming scheduling order in this case.

On April 12, 2012, the parties had their initial status conference with the Court. Pursuant to the Court's recommendations at that conference, on April 16, 2012, the parties submitted a discovery schedule proposal (the "April 16 Proposed Discovery Schedule") that included a one-month delay to the start of discovery to facilitate a possible solution to the litigation. No solution has thus far emerged, and the one-month delay expired on May 16, 2012. Under the parties' proposed discovery schedule, discovery is to now commence.

The parties, however, are hopeful that an additional delay to the start of discovery will lead to a resolution of the litigation. Accordingly, the parties respectfully request that the Court incorporate in its forthcoming scheduling order an additional two-month delay to the start of discovery, with discovery to begin on July 31, 2012. The parties also propose that, following the additional two-month discovery stay, pre-trial activities would proceed as described in the parties' April 16 Proposed Discovery Schedule in that document discovery would last four months, deposition discovery would last six months, expert discovery would last three months and summary judgment

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MEMO ENDORSED

The Honorable Deborah A. Batts

June 1, 2012

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motions would be briefed over three months. With the proposed two-month stay, the new discovery schedule would be as follows:

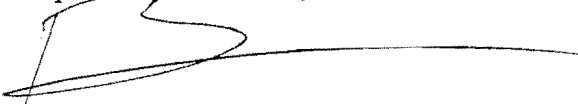
Event	Date
Resumption of Document Discovery	July 31, 2012
Conclusion of Document Discovery	November 30, 2012
Conclusion of Deposition Discovery	May 31, 2013
Expert Reports Due	June 28, 2013
Expert Rebuttal Reports Due	July 31, 2013
Conclusion of Expert Depositions	August 30, 2013
Summary Judgment Motions Due	October 31, 2013
Summary Judgment Oppositions Due	November 27, 2013

Granted.
/DAB/
6/1/12

As with the parties' previously submitted schedule, the parties would endeavor in good faith to provide privilege logs no later than 30 days after the completion of their document productions.

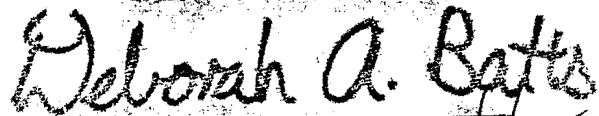
We are available at the Court's convenience to answer any questions.

Respectfully submitted,



Rex Lee

cc: Counsel for Deutsche Bank Securities Inc.

SO ORDERED


DEBORAH A. BATTS 6/1/12
UNITED STATES DISTRICT JUDGE

MEMO ENDORSED